

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

Civil No.: 19-CV-484-PP

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

DECLARATION OF NATALIA CANAAN

I, Natalia Caanan, swear as follows:

1. I am over 18 years old and have personal knowledge regarding the facts set forth in this Declaration. If called to testify, I could and would testify competently regarding the facts recited herein.
2. I am employed as a receptionist by R.C. Baral & Company Inc., which also employs Tal Benari.
3. While I am working as the receptionist, I am seated behind a counter in a waiting area that is open to the public. Two doors leading from the waiting area to the interior offices are kept closed.
4. My duties as receptionist include answering telephone calls; greeting visitors; and notifying others who work in the office suite that visitors have arrived. When I am working as the receptionist, while I am authorized to accept routine deliveries on behalf of the company, I

am not authorized to accept service of process, either on behalf of the company or on behalf of anyone who works there. I am not the person in charge of the office.

5. While I was working as the receptionist one day in early March, 2019, which I believe to have been on or about March 6 or 7, 2019, a man who I did not recognize entered the waiting area, carrying a packet of documents. He asked to see Mr. Benari. Mr. Benari was not in the office, and I told the visitor that. The visitor left without leaving any documents behind.

6. While I was working as the receptionist on or about March 7 or 8, 2019, the man who had asked for Mr. Benari returned and again asked for him. When I truthfully told him that Mr. Benari was not in the office, he attempted to leave a packet of documents with me. I told him that I was not authorized to accept anything on Mr. Benari's behalf. The man nevertheless put the packet of documents on the counter and left.

7. When I looked at the documents, they appeared to include a summons in the lawsuit by Andrew Colborn against Chrome Media and other defendants. I gave the documents to Mr. Benari when he returned to the office.

8. While I was working as the receptionist on or about March 15, 2019, the same man returned. He gave me a business card and told me to give the card to Mr. Benari and have Mr. Benari call him. The business card identified the man as Carlos A. Caceres, a "Registered Process Server." A true and correct copy of the business card is attached hereto as Exhibit A.

Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of MAY 2019.


Natalia Canaan